

Michael V. Infuso, Esq., Nevada Bar No. 7388
Keith W. Barlow, Esq., Nevada Bar No. 12689
GREENE INFUSO, LLP
3030 South Jones Boulevard, Suite 101
Las Vegas, Nevada 89146
Telephone: (702) 570-6000
Facsimile: (702) 463-8401
E-mail: minfuso@greeneinfusolaw.com
kbarlow@greeneinfusolaw.com

Attorneys for ProCaps Laboratories, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PROCAPS LABORATORIES, INC., a
Nevada Corporation,
Plaintiff,
v.

GH EXPRESS CALI INC., a foreign
corporation; DOES 1 through 10, inclusive;
and ROES 1 through 10, inclusive,

Defendants.

GH EXPRESS CALI, INC.

Counterclaimant,

v.

PROCAPS LABORATORIES, INC.
Counter Defendant.

Case No. 2:21-cv-02016-JAD-BNW

**STIPULATION AND ORDER FOR
LEAVE FOR PLAINTIFF TO FILE AN
AMENDED COMPLAINT**

**STIPULATION AND ORDER FOR LEAVE
FOR PLAINTIFF TO FILE AN AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff PROCAPS LABORATORIES, INC. ("Plaintiff") and Defendant GH EXPRESS CALI. ("Defendant"), by and through their respective undersigned counsel of record, as follows:

WHEREAS, Plaintiff commenced this action by filing its Complaint on November 8, 2021;

WHEREAS, Defendant filed its Answer and Counterclaim on March 21, 2022;

1 WHEREAS, Defendant refiled its Answer and Counterclaim on March 24, 2022;
2 WHEREAS, Plaintiff filed its Answer to Defendant's Counterclaim on April 11, 2022;
3 WHEREAS, the deadline to amend the pleadings and add parties is June 22, 2022;
4 WHEREAS, Plaintiff seeks to add Manjinder Kaur dba GH Express as a Defendant to this
5 action; and

6 WHEREAS, Plaintiff and Defendant stipulate and agree that Plaintiff may amend its
7 Complaint to identify Manjinder Kaur dba GH Express as an additional Defendant.

8 Accordingly, the parties request that the Plaintiff be allowed to file a First Amended
9 Complaint on or before June 22, 2022.

10 **IT IS SO STIPULATED.**

11 Dated this 22 day of June 2022.

12 GREENE INFUSO, LLP

13
14 /s/ MICHAEL V INFUSO
15 MICHAEL V. INFUSO, ESQ.
16 Nevada Bar No. 7388
3030 South Jones Boulevard, Suite 101
Las Vegas, NV 89146
Attorneys for Plaintiff
17 PROCAPS LABORATORIES, INC.

Dated this 22 day of June 2022.

AJS LEGAL

AMY J. SMITH, ESQ.
Nevada Bar No. 14954
2920 N. Green Valley Pkwy.,
Bldg. 5, Ste. 524
Henderson, NV 89014

THE REICH LAW FIRM

18 /s/ Jeff Reich
19 Jeff Reich
20 Cal. Bar No. 067250
8441 N. Millbrook, Ste. 104
Fresno, CA 93720

21 Attorneys for Defendant
22 GH Express Cali Inc.

23 **ORDER**
24 **IT IS SO ORDERED**

25 **DATED:** 4:19 pm, June 23, 2022

26 

27 **BRENDA WEKSLER**
28 **UNITED STATES MAGISTRATE JUDGE**